

Solution Cover Sheet			
Name of Respondent Organization Comcast			
Mailing Address 676 Island Pond Road	City/Town Manchester	State NH	Zip Code 03109
Telephone 603-695-1722	Fax 978-825-2312	Respondent Web Address www.comcast.com	
Name of Primary Contact (Individual) Alicia C. Matthews			
Primary Contact Title Director, Competitive Issues		Contact e-mail address alicia_matthews@cable.com	Direct Telephone # 978-825-2373
Which of the following best describes the respondent: (You must select at least one)			
<input checked="" type="checkbox"/> Broadband Service Provider <input type="checkbox"/> Government Organization <input type="checkbox"/> Equipment Manufacturer <input type="checkbox"/> Non-profit Organization <input type="checkbox"/> Equipment Vendor <input type="checkbox"/> Owner of Physical Assets (please specify Asset: _____ _____)		<input type="checkbox"/> Network or Systems Integrator <input type="checkbox"/> Interested Individual <input type="checkbox"/> Investor/Venture Capital <input type="checkbox"/> Consultant <input type="checkbox"/> Advocacy Group <input checked="" type="checkbox"/> Other (please specify Other: <u>See below</u> _____ _____)	
Brief Description of Organization (please outline previous experience with broadband deployment and/or provision of broadband services)			
Comcast Corporation is the nation's leading provider of entertainment, information and communication products and services. With 24.4 million cable customers, 14.7 million high-speed Internet customers and 6.1 million Comcast Digital Voice customers, Comcast is principally involved in the development, management and operation of broadband cable systems and in the delivery of programming content.			
List of anticipated partner organizations Willing to discuss.			



Comcast Cable Communications, Inc.  
676 Island Pond Road  
Manchester, NH 03109  
603.695.1400 Tel  
603.628.3303 Fax  
www.comcast.com

December 19, 2008

*Via U.S. Mail and Electronic Mail ([broadband@masstech.org](mailto:broadband@masstech.org))*

Massachusetts Broadband Institute  
c/o Massachusetts Technology Collaborative  
75 North Drive  
Westborough MA 01581

RE: Response to Call for Solutions

Dear Members of the Board, Massachusetts Broadband Institute,

Comcast is pleased to respond to the Massachusetts Broadband Institute's ("MBI") Call for Solutions ("CfS"). Comcast supports the Statement of Principles submitted by the New England Cable and Telecommunications Association in response to the CfS and offers the following additional comments for the MBI's consideration.

Comcast entered the Massachusetts market in 2003, and, since that time, has invested over \$1.5 billion to fully upgrade our network in Massachusetts. Our investment has allowed Comcast to launch digital video, high-speed Internet and digital voice products to every community we serve, and continue to innovate in the products and services we offer our Massachusetts customers. We now operate in 238 communities throughout Massachusetts, offering our full suite of advanced broadband products and services. Additional communities are served by other providers, such as Time Warner in the Berkshires, and Charter in portions of Western Massachusetts and Worcester County. In fact, cable broadband passes 97 percent of homes in the state.

Comcast understands that despite our extraordinary investment, and that of other private providers, there remains a small percentage of Massachusetts households, virtually all located in western Massachusetts, that lacks access to broadband service. The MBI has recognized that "[g]iven the geography and population density of western Massachusetts, there are market impediments to the private sector, on its own, deploying broadband service comparable in quality and price to that of eastern Massachusetts." Given the MBI's recognition of the economic factors that have contributed to the lack of broadband service in certain areas, Comcast urges the MBI to remain focused on its stated legislative priority and dedicate its resources to providing broadband access in only those areas of western Massachusetts where there is no broadband service currently available. The MBI should ensure that, in its administration of the fund, no public dollars are awarded to municipalities or private parties that plan to supplant private investment and deploy

facilities in competition with a private provider. Public investment in deploying facilities in competition with pre-existing providers would be a negative message to those providers who invest, deploy communications infrastructure, and employ thousands of Massachusetts residents to support their investments. To this end, the MBI should clarify that any reference to “under-served areas” means areas where there are citizens with no access to broadband service. Subsidizing areas already served by private providers would have a market-tilting effect of deterring further private investment—and private investment will remain the primary driver of broadband deployment and innovation.

In this regard, Comcast is concerned with statements made by some MBI Board members that a portion of the \$40 million fund will be used to address “needs” in other part of the Commonwealth. In keeping with its legislative mandate, MBI’s first priority is to address access issues in western Massachusetts. Once the solutions are identified, and funds allocated to implement those solutions in western Massachusetts, the MBI can then look to other areas of qualifying investment. There should be no arbitrary limit imposed on meeting the needs of unserved citizens in western Massachusetts. The failure to clearly prioritize the needs of unserved citizens would divert scarce government resources away from the rural communities that are not served by any broadband provider and to discourage further private sector investment.

Because of the significant investment that will be required to resolve the access to broadband issue in western Massachusetts, the MBI should consider contributing to increased broadband deployment by more clearly defining the need for broadband access. As has been suggested previously, more reliable information which better identifies both unserved areas and consumer demand would be helpful to all potential providers.

One significant cost for service providers, like Comcast, is the engineering studies needed to assess new areas prior to the consideration of construction. Engineering studies would include, but not be limited to, clear identification of unserved road miles, pole make-ready conditions, number of homes and businesses in unserved areas, number of homes located a significant distance from public ways, road conditions, underground ties, bridge and rail crossings, and the creation of maps. The cost of such studies can be significant, and engineering studies for unserved areas may provide the private provider community with the information needed to support a decision to deploy in particular areas.

In conjunction with more clearly defining the need for broadband access, the MBI should also better determine the demand for such service. Comcast appreciates the effort of Pioneer Valley Connect and Berkshire Connect to assess the demand among consumers. However, to date, there has been no consumer survey or other means to determine if consumers are willing to pay for broadband service at comparable prices to those paid by consumers in the rest of Massachusetts, which would be an important element in any provider’s calculation to deploy services.

Additionally, Comcast suggests that there is likely no one solution for the issue in western Massachusetts. Therefore, Comcast suggests that the MBI, in developing its

implementation plans and policies, maintain the legislative directive that the consideration for funding be technologically neutral. With respect to technological innovation, Comcast continues to innovate and increase broadband speeds to consumers. Comcast currently offers 6 and 8 Mps tiers of service as well as "Powerboost," a proprietary technology which uses available network capacity to increase download speeds at up to 16 Mbps. We have recently begun our Massachusetts launch of DOCSIS 3.0, our next generation of high-speed internet service, which offers tiers of service at significantly increased speeds, and has the potential to reach speeds of up to 160 Mbps. Our participation in the new Clearwire venture further provides us with the opportunity to create the next generation of mobile broadband products with other innovative technology companies and deliver them to consumers across the United States. Comcast is also willing to explore, in collaboration with the MBI and other partner companies, other wireless alternatives to provide broadband to rural Massachusetts, including the use of recently FCC approved TV White Space spectrum.

Finally, it bears mentioning that the MBI continues to make policy and move forward without the Governor's four appointees provided for in the legislation. This is unfortunate because the experience and opinions of these appointees would presumably contribute to the plans and policies of the MBI. We encourage these appointments to be made forthwith.

We look forward to exploring this opportunity with the MBI, particularly if Massachusetts remains an attractive state for further investment.

Sincerely,



Alicia C. Matthews *ACM*  
Director, Competitive Issues  
Comcast—NorthCentral Division

ACM/tem